

# FARNAN LLP

February 10, 2014

**Via Hand Delivery**

John A. Cerino  
Clerk of Court  
United States District Court  
for the District of Delaware  
844 N. King Street, Unit 18  
Wilmington, Delaware 19801-3570

FILED  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
*[Handwritten signature]*

RE: *TQ Delta, LLC v. Pace Americas LLC, et al.*  
Civil Action No. 13-1835-RGA

Dear Mr. Cerino:

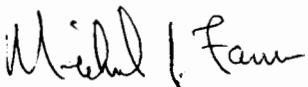
We represent Plaintiff in the above case and respectfully request your assistance with serving a foreign defendant, Pace plc, with process in accordance with Federal Rule of Civil Procedure 4(f)(2)(C)(ii), which applies to foreign corporations pursuant to Rule 4(h)(2).

We respectfully request that you serve Pace plc with a copy of the enclosed Second Amended Complaint and Summons by mail in a manner that requires a signed receipt. The mailing should be addressed as follows:

Michael Pulli  
Chief Executive Officer  
Pace plc  
Victoria Road  
S爾taire  
West Yorkshire  
BD18 3LF, England

Please let us know the amount of the postage and any related fees, and we will promptly pre-pay any such fees by check. We appreciate your assistance and are available at your convenience should you have any questions.

Respectfully,



Michael J. Farnan

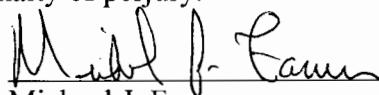
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

TQ DELTA LLC, :  
: Plaintiff,  
: v. : C.A. No. 13-1835-RGA  
PACE AMERICAS, LLC, : JURY TRIAL DEMANDED  
PACE PLC, and 2WIRE, INC. :  
Defendants. :  
: Defendants.

**AFFIDAVIT OF MICHAEL J. FARNAN IN SUPPORT OF  
REQUEST FOR CLERK TO SERVE PACE PLC CORPORATION**

Michael J. Farnan, being duly sworn according to law, deposes and says as follows:

1. Farnan LLP and McAndrews, Held & Malloy Ltd. represent Plaintiff, TQ Delta LLC, in the above case and have requested that the Clerk of Court serve Defendant, Pace plc, with process pursuant to Federal Rules of Civil Procedure 4(f)(2)(C)(ii) and 4(h)(2).
2. After a review of the relevant case law and the Department of State's website, [www.travel.state.gov](http://www.travel.state.gov), I have concluded that a British entity may be served with process by mail.
3. The forgoing statements are true to the best of my knowledge, information, and belief and are made subject to the penalty of perjury.

  
\_\_\_\_\_  
Michael J. Farnan

County of New Castle)  
State of Delaware)

SWORN AND SUBSCRIBED before me this 10<sup>th</sup> day of February, 2014.

